

March 8, 2017

James Arden Barnett, Jr., RDML USN

**Filed Via ECFS**

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Try Safety First, Inc. (which is becoming Cell Command, Inc.), GN Docket No. 13-111**

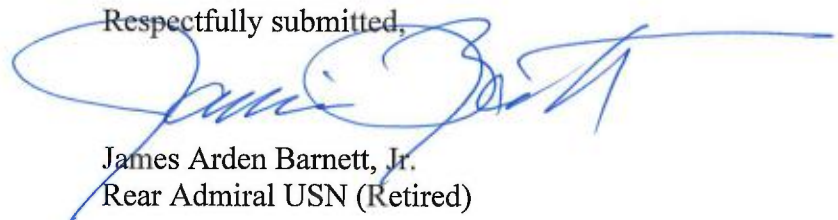
Dear Ms. Dortch:

On March 3, 2017, Rear Admiral James Arden Barnett, Jr. of this firm met with Acting Bureau Chief Lisa Fowlkes and Deputy Bureau Chief David Furth of the FCC's Public Safety and Homeland Security Bureau (PSHSB) on behalf of Try Safety First, Inc. (which is becoming Cell Command, Inc.) to discuss the proposed Report and Order and Further Notice of Proposed Rulemaking in the matter of promoting technological solutions to combat contraband wireless device use in correctional facilities.

Admiral Barnett urged the need for a complete solution to the serious problem of contraband cell phones. The technology must render the cell phone useless and incapable of even recording photos or text; otherwise unconnected cell phones can still be passed and used for illicit and unauthorized communication. Cell Command's beacon technology, Cell Warden, renders the device incapable of any use. Admiral Barnett compared various technologies using the attached chart, which updates the same comparative chart, filed as part of a white paper by Try Safety First, Inc. on August 29, 2016.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'James Arden Barnett, Jr.', is written over the typed name and title.

James Arden Barnett, Jr.  
Rear Admiral USN (Retired)

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cc: Lisa Fowlkes, Acting Bureau Chief  
David Furth, Deputy Bureau Chief, Public Safety and Homeland Security Bureau

## Top 11 Performance Measures For Evaluating System Efficacy For CCI Prison Protocol Technology & Competing Systems (Voiced By Corrections Personnel and Industry Participants)

	Performance Measure	Cell Command, Inc. Prison Protocol	Jamming Systems	Managed Access Systems	Detection & Location
1.	System Terminates All Phone Functionality	YES	NO	NO	NO
2.	Is the Technology Solution Legal?	YES	NO	With FCC Approval	Yes
3.	Approximate Cost/ Facility?	* \$100K - \$250K Per Facility	\$350K - \$1.2 million Per facility	\$1.2 - \$5 million Per Facility	\$300K - \$1 million Per Facility
4.	System Frequency Containment Issues?	NO	YES	Yes Urban Environments	No
5.	Effectiveness % to Terminate Service?	< 100% >	unknown	Unknown % (No test and evaluation results)	0% Service NOT Terminated
6.	Obsolescence Issues	NO	YES	Yes	Yes
7.	Requires On-Site Staff Monitoring?	NO	YES	Yes	Yes
8.	Does 911 Work?	YES	NO	Yes	Yes
9.	Can System Locate Phones?	+ LIMITED + ASSISTANCE	NO	No	± Yes ±
10.	Does System Dissuade Continued Smuggling?	YES	NO	No	No
11.	Handsets Require Protocol Inclusion?	♦ YES ♦	No	No	No

- \* READ White Paper to learn how the CCI Prison Protocol Business Model could outfit every Correctional Facility FREE!
- <> To date, CCI technology has only undergone "Bench Testing." Actual prison testing is being scheduled.
- + The TrySafetyFirst prison protocol system has an automated Guard Alert function which creates a loud screaming siren prior to disabling and shutting down the phone.
- ± Detection & Locations systems can locate the approximate location of phones ONLY when they are monitored AND the phone is on.
- ♦ Handset protocol inclusion will be viewed by critics as a major hurdle. And while CCI agrees it will be challenging, CCI has designed a specific strategy and migration timeline to mitigate this concern and ultimately prevail (outlined in White Paper). Absolute success and complete compliance will be insured with FCC involvement.